

Message

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Sent: 11/5/2018 9:24:27 PM
To: O'Connor, Darcy [oconnor.darcy@epa.gov]
CC: Shea, Valois [Shea.Valois@epa.gov]; Minter, Douglas [Minter.Douglas@epa.gov]
Subject: draft Dewey Burdock talking points - DELIBERATIVE/PRE-DECISIONAL

Hi Darcy –

Here are the draft talking points for your discussion with Azarga this week. Please let us know if you have questions.

- We continue to work on the 2nd draft permits and fact sheets for public notice on May 1, 2019.
- We are initiating the contract work to develop model criteria and documentation to support our model permit requirements and fact sheet justifications for the protectiveness of the model approach to replace a number of requirements in the 1st Class III draft permit.
 - We believe the contract support will save the UIC staff time in developing the model permit requirements and especially the fact sheet justifications.
 - Modeling is replacing post-restoration monitoring, the additional excursion requirements in the 1st Class III draft permit, and the additional requirements for authorization of wellfields 6, 7 and 8 (that's a lot of justifying that needs to be done!)
 - This modelling work needs to be done upfront so that EPA can provide the necessary transparency to other stakeholders and the public on the changes they will review in the 2nd Class III draft permit, and how the modeling approach will be protective.
- We are waiting to hear back from Azarga on whether the AE boundary needs to be changed. Reminder: if AE area is expanded we need an updated AE application with an updated capture zone analysis. We would public notice the updated AE record of decision with the 2nd draft permits on May 1.
 - Does Azarga need any additional information from EPA to finalize their AE decision?
- We continue working on addressing comments on the EJ analysis, CEA, and ESA.
- Ask Powertech if they have heard anything from the NRC regarding a Board decision on the summary disposition of the NEPA contention involving the cultural survey.
- Separately, on October 17th, EPA sent Azarga a second notice asking that they request withdrawal of two outdated Class I (2010) and V (2009) permit applications within 30 days for their proposed Centennial uranium ISR operations in northeastern Colorado. John Mays recently told EPA that he would be meeting with Azarga's Board in early November to inform their decision about application withdrawn. If there is time, we may want to remind them about this. If they don't withdraw, we would proceed with the permit denial process.

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